

Paul P. Eyre  
Ernest E. Vargo  
Michael E. Mumford  
Erin K. Murdock-Park  
BAKER & HOSTETLER LLP  
PNC Center  
1900 East Ninth Street, Suite 3200  
Cleveland, Ohio 44114-3482  
Telephone: 216.621.0200  
Facsimile: 216.696.0740  
peyre@bakerlaw.com  
evargo@bakerlaw.com  
mmumford@bakerlaw.com  
emurdockpark@bakerlaw.com

Tracy L. Cole  
BAKER & HOSTETLER LLP  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4210  
Facsimile: (212) 589-4201  
tcole@bakerlaw.com

Attorneys for Defendants Mitsui & Co. (Taiwan),  
Ltd. and Mitsui & Co. (U.S.A.), Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

This Document Relates to Individual Case  
No. 3:11-cv-03763-SI

Case No. 3:11-cv-03763-SI

Master File No. 3:07-md-1827-SI

MDL No. 1827

INTERBOND CORPORATION OF  
AMERICA,

Plaintiff,

v.

AU OPTRONICS CORPORATION, et al.,

Defendants.

STIPULATION OF EXTENSION OF TIME  
FOR DEFENDANTS MITSUI & CO.  
(TAIWAN), LTD. AND MITSUI & CO.  
(U.S.A.), INC. TO RESPOND TO THE  
FIRST AMENDED COMPLAINT AND  
~~PROPOSED~~ ORDER

**Clerk's Action Required**

1 WHEREAS, plaintiff Interbond Corporation of America d/b/a BrandsMart  
2 (“BrandsMart”) filed a First Amended Complaint in the above-captioned action against  
3 defendants Mitsui & Co. (Taiwan), Ltd. (“Mitsui Taiwan”) and Mitsui & Co. (U.S.A.), Inc.  
4 (“Mitsui USA”), among other defendants, on November 1, 2011.

5 WHEREAS, BrandsMart, Mitsui Taiwan and Mitsui USA, among other defendants,  
6 previously entered into a stipulation giving Mitsui Taiwan and Mitsui USA until December 5,  
7 2011 to move to dismiss, answer or otherwise respond to the First Amended Complaint. (*See*  
8 Dkt. #24; MDL Dkt. #3957.)

9 WHEREAS, on December 1, 2011, Mitsui Taiwan intends to move to dismiss the  
10 amended complaint in the related case of *Electrograph Systems, Inc., et al. v. Epson Imaging*  
11 *Devices Corp., et al.*, Individual Docket No. 3:10-cv-00117-SI (N.D. Cal.), Master Docket No.  
12 3:07-md-01827-SI (N.D. Cal.) on the grounds that the Court lacks personal jurisdiction over  
13 Mitsui Taiwan.

14 WHEREAS, Mitsui Taiwan and Mitsui USA also intend to raise lack of personal  
15 jurisdiction as a defense in the instant case.

16 WHEREAS, the Court’s ruling on Mitsui Taiwan’s motion to dismiss in *Electrograph*  
17 may be relevant to the issue of personal jurisdiction in the instant case.

18 WHEREAS, in the interests of efficiency and judicial economy, BrandsMart, Mitsui  
19 Taiwan and Mitsui USA have reached an agreement, pursuant to Civil Rule L.R. 6-1(a), that  
20 Mitsui Taiwan and Mitsui USA shall have an additional extension of time until twenty-one (21)  
21 days after the Court rules on Mitsui Taiwan’s motion to dismiss in *Electrograph*, in which to  
22 move against, answer, or otherwise respond to BrandsMart’s First Amended Complaint.

23 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the  
24 undersigned counsel, on behalf of their respective clients, Plaintiffs, on the one hand, and Mitsui  
25 Taiwan and Mitsui USA, on the other hand, that Mitsui Taiwan and Mitsui USA’s deadline to  
26 move to dismiss, answer, or otherwise respond to the First Amended Complaint will be twenty-  
27 one (21) days after the Court issues its order on Mitsui Taiwan’s motion to dismiss the amended  
28 complaint in *Electrograph*.

1 Dated: November 29, 2011

2 By: /s/ Michael E. Mumford  
Paul P. Eyre  
3 Ernest E. Vargo  
Michael E. Mumford  
4 Erin K. Murdock-Park  
BAKER & HOSTETLER LLP  
5 PNC Center  
1900 East Ninth Street, Suite 3200  
6 Cleveland, Ohio 44114-3482  
(216) 621-0200 (Phone)  
7 (216) 696-0740 (Facsimile)  
peyre@bakerlaw.com  
8 evargo@bakerlaw.com  
mmumford@bakerlaw.com  
9 emurdockpark@bakerlaw.com

10 Tracy L. Cole  
BAKER & HOSTETLER LLP  
11 45 Rockefeller Plaza  
New York, NY 10111  
12 Telephone: (212) 589-4210  
Facsimile: (212) 589-4201  
13 tcole@bakerlaw.com

14 *Counsel for Defendants Mitsui & Co. (Taiwan), Ltd.*  
15 *and Mitsui & Co. (U.S.A), Inc.*

16 By: /s/ Philip J. Iovieno  
Philip J. Iovieno  
17 BOIES, SCHILLER & FLEXNER LLP  
10 North Pearl Street, 4th Floor  
18 Albany, NY 12207  
(518) 434-0600 (Phone)  
19 (518) 434-0665 (Facsimile)  
piovieno@bsfllp.com  
20

21 *Counsel for Interbond Corporation of America d/b/a BrandsMart*  
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Attestation: The filer of this document attests that the concurrence of the other signatories thereto has been obtained.

IT IS SO ORDERED.

By:   
Hon. SUSAN ILLSTON